

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	No. 04-10075-PBS
)	
2.MIGUEL IBARRA,)	
)	
Defendant.)	

**ASSENTED-TO MOTION TO ENLARGE TIME IN WHICH TO RESPOND
TO MOTION TO EXCLUDE EVIDENCE**

The United States, by and through counsel, Michael J. Sullivan, United States Attorney, and Rachel E. Hershfang, Assistant United States Attorney, respectfully moves this Court for additional time in which to respond to a motion to exclude evidence, filed by Miguel Ibarra ("Ibarra") on March 2, 2005.

In support of this motion, the government states as follows:

1. The motion was filed in anticipation of a trial scheduled for March 28, 2005. On motion of the parties, the Court agreed to continue that trial to May 9, 2005;
2. The parties currently hope that the case will be resolved short of trial, obviating the need for a government response to the motion to exclude;
3. Undersigned counsel for the government has been in the office for only three days since the filing of the motion to exclude, because of a long-scheduled vacation, and therefore has not had the opportunity to respond to the motion; and
4. Miguel Ibarra, through counsel, has assented to the

request for additional time in which to respond.

Therefore, the government respectfully seeks an additional two and a half weeks (until April 4, 2005) in which to respond to the motion to exclude evidence. (Should the parties reach an agreement regarding a possible plea before that date, they will promptly inform the Court of any such resolution.)

Respectfully submitted,
MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Rachel E. Hershfang
RACHEL E. HERSHFANG
Assistant U.S. Attorney

Dated: March 14, 2005